

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER P. IRVING

Plaintiff,

vs.

COOK COUNTY SHERIFF'S OFFICE,
SUPERINTENDENT MARTHA
YOKSOULIAN, in her individual capacity,
SUPERINTENDENT ERICA QUEEN, in
her individual capacity,
SUPERINTENDENT ESEQUIEL
IRACHETA, in his individual capacity,
LIEUTENANT LANESHIA PONDEXTER,
in her individual capacity, SERGEANT
PATRICK FITZGERALD, in his individual
capacity, OFFICER DANIEL LAKOWSKI,
in his individual capacity, OFFICER
ALECIA LOBIANCAO, in her individual
capacity, and COOK COUNTY, as
indemnitor,

Defendants.

Case No. 22 cv 6599

Hon. Andrea R. Wood

**DEFENDANT'S UNOPPOSED MOTION FOR LEAVE
TO DEPOSE AN INCARCERATED INDIVIDUAL**

NOW COMES Defendant, ALECIA LOBIANCAO, by and through her attorneys, Troy S. Radunsky and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 30(b)(2), and respectfully requests leave to take the deposition upon oral examination of witness Devonte Watson, who is confined in Stateville Correctional Center, and in support, states as follows:

1. Counsels for all other parties have advised that they do not object to the requested deposition and have agreed to its occurrence on December 18, 2023.
2. Devonte Watson is a witness in this case who has information critical to claims made by Plaintiff in his Complaint at Law, as well as potentially relevant to the ultimate damages at issue in this case.

3. Crucially, in Plaintiff's Complaint, he alleges that "[i]nmate Devonte Watson, 'Little D,' ... said that he was told by a correctional officer that Plaintiff was a cop." (ECF No. 1 ¶ 40.)
4. The information sought relates to the time when both Plaintiff and witness Devonte Watson were both detainees with the Cook County Department of Corrections.
5. As of November 9, 2023, Devonte Watson was admitted to Stateville Correctional Center, located at 16830 Illinois Route-53, Crest Hill, IL 60403.
6. Defendant now seeks to depose Devonte Watson regarding information and details related to Plaintiff's asserted claims.

WHEREFORE, the parties respectfully request that this Honorable Court enter an order allowing them to take the remote Zoom deposition of witness Devonte, currently detained at the Stateville Correctional Center.

Respectfully Submitted,

Defendants

By: /s/ Troy S. Radunsky
Troy S. Radunsky, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that **Defendant's Motion for Leave to Depose an Incarcerated Individual** was filed on November 16, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman